

Douglas R. Ricks, OSB #044026  
VANDEN BOS & CHAPMAN, LLP  
319 SW Washington St., Ste. 520  
Portland, OR 97204  
Telephone: 503-241-4869  
Fax: 503-241-3731

Of Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

U.S. Outdoor Holding LLC

Debtor.

Case No. 20-32571-dwh11

MOTION TO WITHDRAW FINAL  
ACCOUNT AND APPLICATION FOR  
ENTRY OF FINAL DECREE AND  
CLOSING ORDER (DOC 146) AND TO  
SET ASIDE FINAL DECREE (DOC 147)

Debtor moves the Court for entry of an Order allowing withdrawal of the Final Account and Application for Entry of Final Decree and Closing Order (the "Final Account") (Doc 146) and setting aside the Final Decree (Doc 147) entered by this Court on April 15, 2021 for the reason the Final Account was submitted to the Court in order to ensure compliance with LBR 2015-1(b) and the confirmed plan has been substantially consummated. However, in light of the Trustee's preference to keep the case open during administration of the plan (Doc 148) and the Debtor's consent to that approach, the Final Decree should be set aside pursuant to FRCP 60(b).

WHEREFORE, Debtor requests entry of an Order in the form attached to this Motion as **Exhibit A** allowing withdrawal of the Final Account and setting aside the Final Decree.

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks  
Douglas R. Ricks, OSB #044026  
Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

U.S. Outdoor Holding LLC

Debtor.

Case No. 20-32571-dwh11

ORDER RE: MOTION TO WITHDRAW  
FINAL ACCOUNT AND APPLICATION  
FOR ENTRY OF FINAL DECREE AND  
CLOSING ORDER (DOC 146) AND TO  
SET ASIDE FINAL DECREE (DOC 147)

Based on Debtor's Motion to Withdraw Final Account and Application for Entry of Final Decree and Closing Order (Doc 146) and to Set Aside Final Decree (Doc 147); and the Court being otherwise fully advised, it is

ORDERED that Debtor's Motion is granted, the Final Account and Application for Entry of Final Decree and Closing Order (Doc 146) is treated as withdrawn, and entry of the Final Decree (Doc 147) is hereby set aside.

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**PRESENTED BY:**

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks  
Douglas R. Ricks, OSB #044026  
Of Attorneys for Debtor

**LBR 9021-1 CERTIFICATION**

I certify that I have complied with the  
requirement of LBR 9021-1(a);

By: /s/Douglas R. Ricks  
Douglas R. Ricks, OSB #044026  
Of Attorneys for Debtor

**First Class Mail:**

U.S. Outdoor Holding LLC  
Attn: Edward A. Ariniello  
600 NW 14th Ave Ste A  
Portland, OR 97209

**Electronic Mail:**

The foregoing was served on all CM/ECF  
participants through the Court's Case  
Management/Electronic Case File system.

CERTIFICATE - TRUE COPY

DATE: April 20, 2021

DOCUMENT: MOTION TO WITHDRAW FINAL ACCOUNT AND APPLICATION  
FOR ENTRY OF FINAL DECREE AND CLOSING ORDER (DOC 146)  
AND TO SET ASIDE FINAL DECREE (DOC 147)

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

U.S. Outdoor Holding LLC  
Attn: Edward A. Ariniello  
600 NW 14th Ave Ste A  
Portland, OR 97209

by mailing a copy of the above-named document to each of the above in a sealed envelope addressed to the last known address. Each envelope was deposited into the postal system at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: April 20, 2021

VANDEN BOS & CHAPMAN, LLP

By: /s/Douglas R. Ricks  
Douglas R. Ricks, OSB #044026  
Of Attorneys for Debtor